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ABSTRACT

Because of mounting budget pressures, a new business model is emerging that offers schools "free" technology supported by online advertising programs and the gathering of market data about students. Proponents argue these corporate associations benefit schools with dwindling resources. Opponents argue they are contrary to obligations to act in the interests of students. Using cookies, online registration, and questionnaires, market profiling gathers demographic information about users and their interests, needs, and buying habits. Arguments supporting the validity of online profiling are misleading, and involve significant obscured costs. Technically proficient children, lacking an understanding of the appropriate boundaries of personal privacy, are easily manipulated for commercial purposes. Positive and ethical school-business partnerships should not require students to observe commercial advertising, nor provide commercial access to captive audiences. Federal law protecting research subjects, the Family Educational Rights and Privacy Act (FERPA), and the Children's Online Privacy Protection Act of 1998 provide schools guidance in developing ethical corporate partnerships. In developing a policy on commercialism, schools should avoid providing access to captive audiences; allow students to provide personal information; permit collection of anonymous data for improving the educational quality of Web sites; require written requests for approval by teachers to use Web sites, considering educational purposes, the nature, motive, and use of market data; carefully guide student research activities; allow teachers to analyze web sites for quality, appropriateness, and suitability of educational materials; and consider all possible impacts before accepting corporate technology resources. (TEJ)

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Updating School Board Policies

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by Nancy Willard, JD

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As pressure on school's budgets and demand for investments in new technologies increase, a new dot.com business model has emerged. This new model involves the offer of "free" technology resources to schools supported by an online advertising program that involves the collection of market-related personal information from students (online profiling) and targeted marketing of students with banner ads — within the educational learning environment.

Hungry for the opportunity to provide Internet access to students, schools are accepting free computer offers from companies without first evaluating the impact on students. Nancy Willard addresses this situation in her provocative report and offers policy makers some advice for avoiding potential problems.

Many educators, parents, and students are unaware of the extent to which dot.com companies[1] can collect and analyze personal information and use this analysis to present banner ads that are targeted to the individual user's demographics and interests. Hungry for the opportunity to provide Internet access and resources to students, schools are accepting these "free" offers with inadequate analysis of the company's activities and inadequate evaluation of the potential impact on students and the learning environment. Schools have an obligation to protect the welfare of their students and ensure the integrity of the learning environment. Allowing companies to engage in online profiling and targeted marketing of students is unacceptable.

Educators must carefully analyze any partnerships with companies to determine whether such partnerships are truly in the best interests of their students and the school's learning environment. This document seeks to provide assistance to educators in this analysis process. It provides a background on issues and concerns related to online profiling and targeted marketing and a framework for educator analysis of the appropriateness of proposed business/school partnerships.

Will Internet in schools become the "stealth portal" to the youth market?

In recent years, there has been growing concern about the rise of commercialism in schools. As school budgets shrink and financial demands increase, corporate America has found innovative approaches to get to young consumers through the place that they spend a lot of their time — in school. Corporate strategies include: the offer of free satellite TV in exchange for 2 minutes a day of advertising for junk foods and hip youth consumer items; cash donations in exchange for an exclusive placement of soft-drink machines; and free curriculum materials provided by companies, such as environmental protection materials provided by oil companies and nutrition materials provided by fast-food chains.

Proponents of advertising argue that corporate involvement with schools is benefi-

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Nancy Willard, Director, Center for Advanced Technology in Oregon, has taught and has practiced law in areas of computer law and copyright. In 1995, she published Legal and Ethical Issues Related to K-12 Internet Use Policies, which has become a widely recognized resource for educators. She has investigated how high school students make decisions about ethical use of the Internet and has recommended research be conducted around issues of the social dimensions of the use of interactive technologies by young people. Readers can contact Dr. Willard at: 5214 University of Oregon, College of Education, Eugene, Oregon 97403-5214.

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cial because it allows schools to supplement dwindling resources. They argue that since ours is a consumer-driven culture, a few advertisements in school are an acceptable trade-off. Opponents counter that corporate attempts to use schools as a means to capture the youth market is unacceptable and contrary to the school's obligation to act in the best interests of its students.

In 1995, the Consumers Union published a report entitled *Captive Kids: A Report on Commercial Pressures on Kids at School*[2]. The Consumers Union concluded "commercialism in U.S. elementary and secondary schools poses a significant and growing threat to the integrity of education in America." One of the disturbing trends the report noted was "(p)ressure on school administrators, teachers, and students to form partnerships with businesses that turn students into a captive audience for commercial messages, often in exchange for some needed resource."

Three principal forces were identified by the Consumers Union that converge to support the rise of commercialism in schools. These are:

- Chronic school budgetary problems;
- The ever-growing presence of commercialism in all sectors of society;
- The growing competition among corporations for the burgeoning "youth" market.

A clash of two worlds: dot.com and dot.edu

The dot.com world is an advertising-intense environment, where a significant amount of content is supported by banner ads. (Banner advertisements are the "blocks," or banners that remain stationary or stream across the computer screen featuring sales commercials of the Web site sponsors.) But other worlds exist on the Internet. The dot.edu world is a world of rich, high quality educational resources and communication activities with an extremely limited amount of banner advertising. Resources available in the dot.edu world have been created by education institutions, informal science, art, and other enrichment centers, non-profit public interest organizations, government agencies, and enlightened corporations that recognize the importance of supporting the education of our nation's children without attempting to peddle products, services, or self-serving ideas.

Online profiling is the collection of information from and about an individual as he or she uses the Internet.

What is online profiling and targeted marketing?

Online profiling is the collection of information from and about an individual as he or she uses the Internet[3]. Once collected, the information provides a detailed profile of the individual's demographic characteristics, interests, needs, and purchasing habits. This profile enables advertising company computers to deliver banner ads that are targeted to the individual's specific interests. The profile may contain personally identifiable information, the individual's name and address, or may be linked with non-personally identifiable information, such as a screen name or an identifier (a "cookie"). Cookies are tiny bits of code that are placed on an individual's hard drive by the web site or a third party that is delivering ads to the web site. Cookies are generally sent without the knowledge of the user. Cookies act as identifiers and also transmit data about the individual's actions on the Web. Additional information may be collected for the profile directly from the individual through registration, surveys, questionnaires, and purchases.

Here is an example of how profiling may work in a school environment:

The XYZ school has established an online learning environment with the ABC company. Jordan, a student at XYZ, must establish a user account on ABC's web site by supplying a user name (some sites require actual names) enabling him to access the learning activities required for his classes. In registering the account, Jordan is asked to provide some basic demographic information, including his age and gender. Jordan's user account forms his initial profile file on ABC's site. To expand its knowledge of Jordan, ABC's computer tracks his activities on its site, as well as his activities on the Internet. ABC frequently posts "Tell us what you think" survey questions. Today's question, "What are your favorite after-school activities?" is followed by a list of typical teen activities. Jordan responds that his favorite activity is playing sports. This interest information is recorded in his profile. The next time Jordan uses the computer to complete his history assignment, he sees an ad for athletic shoes, because ABC has determined he is interested in athletics. ABC's computer records the fact that Jordan has clicked on this ad and will be able to provide the athletic shoe company with data about students who have clicked on their ad.

READ the Privacy Policy — then ask questions

Clearly, it is not acceptable for educators to

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be endorsing partnerships with dot.com companies if they do not have a complete understanding of all of the ramifications of that relationship. Educators should start by reading the company's privacy policy.

Unfortunately, many of these policies are written in "legalese" making understanding difficult. For example, one company's privacy policy reads, "We will use this information to ensure that our user's content and sponsorship experiences are appropriate for them." What this language actually means is, "We use this information to directly target ads to students based on our knowledge of their demographics and interests." School districts should seek the services of the district's attorney in "decoding" these policies.

Not all collection of information is bad; Not all school-business partnerships are inappropriate

Online profiling and targeted marketing should be distinguished from two other activities that do not present concerns: 1.) the collection of aggregated data by web sites for evaluation purposes; and, 2.) the collection of personal information from students for the sole purpose of providing an educational service.

All web sites collect data about how their site is used, including quality educational sites. The data allows the web site owner to evaluate how the site is being used so that the quality of the site can be improved. Data is collected in an aggregated manner. Individual user profiles are not created and the data is not used to support marketing.

All web sites collect data about how their site is used. The data allows the web site owner to evaluate the use so that the quality of the site can be improved.

Some companies providing communication services to schools require specific personal information, such as a student's name used to establish a web-based e-mail account. This should not present concerns as long as the use of student information is limited to the educational service and parental consent is obtained.

How valid are the arguments in support of accepting online profiling and targeted marketing of students in exchange for free technology resources?

Five arguments are frequently raised in support of the appropriateness of dot.com/dot.edu partnerships:

Argument 1: We protect student privacy because we do not ask for the student's actual name. We use only user names — pseudonyms.

- This argument is misleading. Dot.com companies do not need the student's actual name to develop an online name. All they need is a persistent identifier. The student's user name serves this purpose.

Argument 2: Internet content is supported primarily by banner advertising, therefore, students are already exposed to lots of banner ads whenever they use the Internet. The additional exposure to banner ads viewed on dot.com partner sites shouldn't make a difference.

- If students are being exposed to a great deal of banner advertising in school, they are likely not using the Internet in ways that support learning. A recent study evaluated sites that students accessed in school for their suitability for academic research and found that only 27% of the sites students accessed were considered to be reliable sources of information[4]. The sites visited most frequently, commercial sites, were rated as having the lowest educational value. Web sites that have a limited amount of banner advertising do not generally contain animation placed in locations on the site where they might distract students from focusing on the content
- A school endorsement of a dot.com partner's web site also acts as an endorsement of the presence of banner advertising in the educational environment. Additionally, the school's endorsement serves as an implied endorsement of the products or services advertised to the children through the dot.com partner's site.

Argument 3: Banner ads are not distracting or intrusive. Students are experts at multitasking and can easily filter out the ads.

- The sole mission in life of a banner ad is to attract attention. Research in human-computer interface verifies that animated banner ads are intrusive and distract users from the content. As a recent report noted:

  "Ad agencies aren't stupid . . . they know that adding motion and flashing to a web page is a sure-fire way to attract attention. And it's true — adding animation is a powerful way to catch a reader's eye. But beware that this can also work against you. Many users complain that animation is too distracting, making it difficult to concentrate on the content of the page.[5]"

Argument 4: The dot.com partner is providing access to a safe, filtered environment so our students are more protected in their use of the Internet.

- An environment that supports the collection of personal private information from children and then uses that information to manipulate children for consumer purposes is not a safe environment.

Argument 5: It is OK to use dot.com web sites because we have parental consent.

- Consent, yes, but the "price" that students and their parents are being expected to pay for involvement in or use of the school's technology learning environment is the invasion of their personal privacy and the distraction and manipulation of advertising.

And this generally occurs without full disclosure. Too frequently, school administrators approve dot.com/dot.edu partnerships without a full and complete understanding of the level of corporate access they are providing to their students. Parents trust school administrators to act in the best interests of their children so many will approve their child's participation based solely on the endorsement of the dot.com company by

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the school. When administrators enter into partnerships with dot.com companies without a full and complete understanding of the facts and without providing full and complete information to parents, they are failing in their fiduciary duty to protect their students.

Who *really* wins in the online profiling and targeted marketing game?

Dot.com companies argue that it is a wonderful benefit for them to develop individualized market profiles so they can do a better job of providing individuals with advertisements for products and services in which they are likely to have an interest[6]. However, there is widespread and growing concern about current online profiling practices, principally, that much of the collection is done without the individual's knowledge or consent and the use and dissemination of the information is beyond the individual's control.

A recent Business Week/ Harris Poll found that 89% of consumers are uncomfortable having their web browsing habits and shopping patterns merged into a profile. Although the poll tested adult concerns, it is unlikely these would diminish when regarding the privacy of their children.

A recent Business Week/Harris Poll on online privacy found that 89% of consumers are not comfortable having their browsing habits and shopping patterns merged into a profile that is linked to their real name and identity[7]. Sixty-three percent are not comfortable having their online movements tracked even if the data is not linked with their name.

It is unlikely that adult concerns about privacy are going to diminish. Many adults are still unaware that such profiling is occurring. For example, only 40% of those surveyed in the BW/Harris Poll had even heard of *cookies*. Further, concerns about privacy reflected in annual BW/Harris Polls have been growing, not diminishing, in recent years. It also is unlikely that parents' privacy beliefs would change if the questions were focused on their children.

The following are the most important paragraphs in this report!

Dot.com companies have an advantage in reaching children. The emergence of an understanding of the appropriate boundaries of personal privacy is clearly a developmental process, tied to the child's emerging cognitive development. Technically proficient children are using the Internet before they have the cognitive ability to appreciate the possible consequences of disclosure of personal information. Dot.com companies can use this to their advantage in seeking to mold the children's perceptions about personal privacy. They are able to accomplish this largely outside of parental influence because most parents do not know about the actions and intentions of these companies.

Dot.com companies are asking children to disclose personal information, which they use for the purpose of influencing consumer behavior. Such companies are working with child psychologists to gain better insight into the thinking of children to improve their ability to manipulate the child for commercial purposes. Children raised in such an environment may fail to develop an understanding of the appropriate boundaries of personal privacy effecting themselves and others.

There ought to be a law . . . !

Unfortunately, there are no laws, policies, or regulations that specifically address the concerns presented in this report. Nevertheless, school administrators must engage in a careful thorough analysis of the appropriateness of any involvement with dot.com companies. Guidance in conducting this analysis can be found from a variety of sources.

Constitutional Analysis

States have a constitutional obligation to provide a free, public education. Increasingly, schools have determined that access to educational and communications resources on the Internet are an important component of the educational preparation of children for the 21st century. In light of its constitutional obligations, schools should consider whether it is ethical — or legal — to establish a technology-based learning environment that will require students to consent to the collection of their personal private information by a third-party commercial company as a condition for participation in the program.

Education Policies on Commercialism in Schools

In 1998, the National Association of State Boards of Education (NASBE) conducted an analysis of issues of commercialism in schools. The membership approved, through resolution, a set of principles to guide state boards in the development of policy regarding corporate involvement in schools. The principles relevant to the present discussion are:

"School-business relationships based on sound principles can contribute to high quality education. However, compulsory attendance confers on educators an obligation to protect the welfare of their students and the integrity of the learning environment. Therefore, when working together schools and businesses must ensure that educational values are not distorted in the process. Positive school-business relationships should be ethical and structured in accordance with the following principles:

1. Corporate involvement shall not require students to observe, listen to, or read commercial advertising.
2. Selling or providing access to a captive audience in the classroom for commercial purposes is exploitation and a violation of public trust." (1998)[8]

Federal Policy on the Protection of Human Subjects

Federal law for the protection of human subjects in the context of academic research can provide schools with guidance on standards

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that are considered necessary to protect the welfare of research subjects[9]. These rules can provide a benchmark for determining protections that are necessary for the welfare of research subjects, especially children. They require that:

- Academic researchers seeking to gather data from students must demonstrate that their research will have a social benefit.
- Researchers must provide a detailed human subjects protocol that addresses issues of privacy and confidentiality, potential risks to the subjects, and how those risks will be mitigated. The human subjects protocol must be approved by the research institution's Institutional Review Board and then by the individual school district prior to any collection of data from students.
- Researchers must prepare an informed consent document for parents and older children which outlines the socially beneficial purpose of the research and the provisions for the protection of the child. Both the parent and the child must sign the informed consent document.
- Research conducted in established or commonly accepted educational settings, involving normal educational practices, does not require a full human subjects protocol or an informed consent document.

Family Education Rights and Privacy Act

Any provision of personal information of students by the school must be in compliance with the Family Educational Rights and Privacy Act (FERPA). FERPA would clearly require parental consent before the school could provide students' personally identifiable information to a third party. In accord with the spirit — but not the actual language — of FERPA, schools should also provide disclosure and obtain parental consent before allowing or encouraging students to provide personally identifiable information on a web site while at school.

Children's Online Privacy Protection Act

Schools also must be aware of how they might be impacted by the Children's Online Privacy Protection Act of 1999 (COPPA)[10]. COPPA, effective April 21, 2000, applies to the online collection of personal information by commercial web sites from children under 13 years of age. The new rules spell out what a web site operator must include in a privacy policy, when and how to seek verifiable consent from a parent, and what responsibilities an operator has to protect children's privacy and safety online. COPPA applies to individually identifiable information about a child that is collected online, such as full name, home address, email address, telephone number, or any other information that would allow someone to identify or contact the child. COPPA also covers other types of information — for example, hobbies, interests and information collected through cookies or other types of tracking mechanisms — when they are tied to individually identifiable information.

The rules in place that protect the welfare of student research subjects can provide a benchmark for determining protections for web-browsing students.

Recommended Principles for a School Policy on Commercialism on the Internet

- Providing access to a captive audience in the school's technology learning environment, whether accessed in school or from home, for commercial purposes, including specifically online profiling and/or advertising, is "exploitation and a violation of public trust and a violation the right of students to a free and public education."[11]
- Students should not be permitted to provide personally identifiable information, such as name, address, or other contact information, on the Internet unless the provision of information is by a student over the age of 13 and is for an approved, legitimate educational purpose[12].
- The collection of anonymous data from students using a web site for the purposes of evaluation and improvement of the educational quality of a web site is considered appropriate and acceptable.
- In any case where a school/teacher desires to use the services of a web site, the school/teacher must make a written request for approval. The request for approval should address the following issues:
  - — What is the educational purpose of the use of the site?
  - — How does the use of this site meet an identified educational need?
  - — What information will be collected directly or indirectly from the student as they use the site? What is the purpose of the collection of information?
  - — Does the site have any banner ads? If so, what is the relationship of the collection of data to the presence of banner advertising?
  - — Does anyone else, other than the site, have the ability to collect information directly or indirectly from the student? If so, who and for what purpose?
  - — Will students' personal information be disseminated to any other party? If so, under what conditions and for what purposes?
  - — What security provisions have been established to ensure the confidentiality of students' personal information?
  - — What provisions have been made for the students and/or their parents to review and delete personal information from the company's files?
- Schools should carefully guide the research activities of students to limit student exposure to banner advertising. Students should receive instruction on research strategies that will enable them to find high-quality, educational resources to support their learning.

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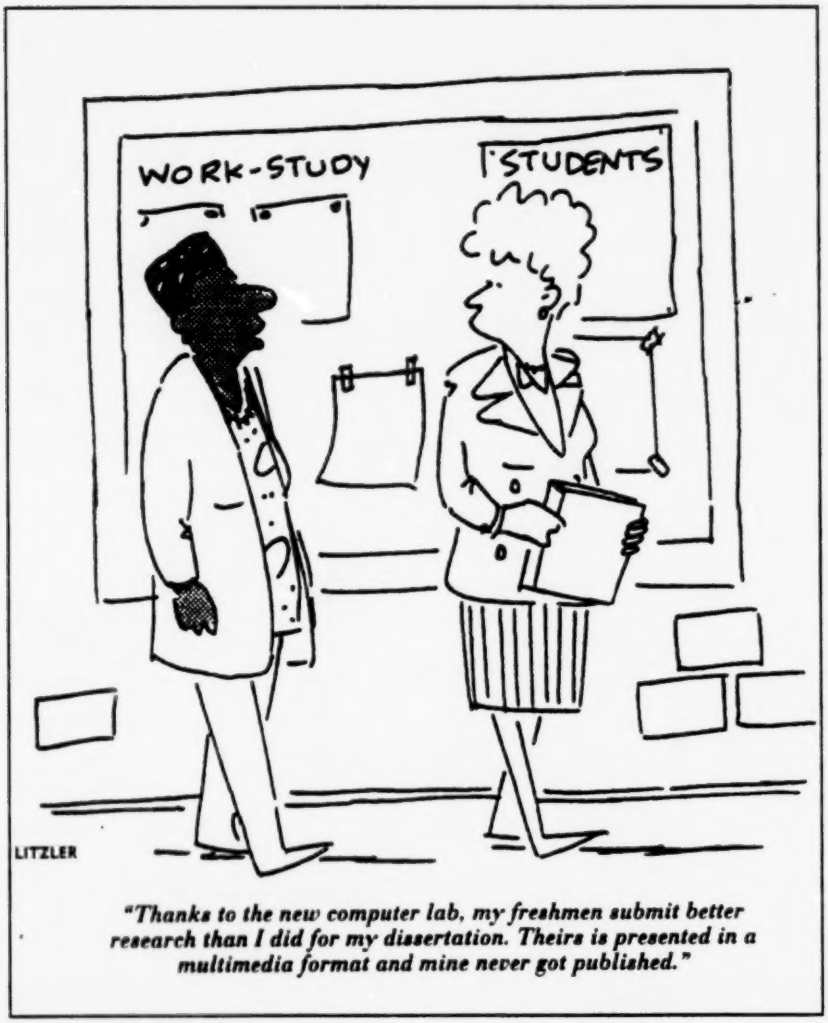
- If teachers are selecting sites for student research, the sites should first be analyzed for the quality, appropriateness, and suitability of the educational materials present on the site. The site should also be reviewed for the presence of banner ads. The following are questions and guidelines for an evaluation of the appropriateness of the advertising on a site:
  - — How intrusive and distracting are the banner ads visually?
  - — Are the ads placed in locations where the students should be concentrating on the content of what they are studying?
  - — Are the ads for youth consumer items or are they public service announcements, educational products or services?
  - — If students click on the banner ads, is what is presented to them considered appropriate in the educational environment?
  - — Is advertising the vehicle to support the delivery of high quality educational resource or has the educational resource been established for the purpose of advertising, brand promotion, or corporate promotion?
- All involvement with corporations for the provision of technology resources should be evaluated in terms of the following criteria:
  - — What is the educational quality of the proposed technology resource?
  - — How will the proposed technology resource assist the school in achieving a stated educational objective?
  - — How will the school provide for the additional resources or activities, including professional development, necessary to ensure the appropriate and effective use of the proposed technology resource to improve student learning?
  - — What impacts will the proposed technology resource have on the existing and future technology infrastructure of the district or school?
  - — What impacts will the proposed technology resource have on the reputation of the district/school regarding the provision of high quality educational services to students?



"Thanks to the new computer lab, my freshmen submit better research than I did for my dissertation. Theirs is presented in a multimedia format and mine never got published."

Conclusion

Nothing in this report should be considered criticism of enlightened companies that have taken a long-term perspective on the importance of education of our nation's youth and the role that technology can play in this education. Such companies are generously providing resources and support to assist schools in technology planning and implementation and in the development of high quality educational resources on the Web.

A significant number of companies, however, believe that profiling and advertising is simply the model by which the Internet functions. They argue that online profiling and targeted marketing allows them to provide services without costs to schools and thus the benefit to students outweighs the concerns of invasion of privacy and intrusion of advertising into the learning environment.

It is not possible for schools to teach children about the importance of protecting their personal privacy on the Internet if they are entering partnerships that require students to agree to the collection of personal information as a condition for use of the technology resources. As a result, school districts/administrators/teachers should make every effort to identify the potential benefits and consequences associated with the partnership and then determine a course of action that preserves students' right to privacy while also providing positive educational experiences.

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News From NCES

Elementary and secondary school enrollment May 2000

- Total (public and private) elementary and secondary school enrollment increased considerably during the late 1980s and 1990s, reaching an all-time high of 52.7 million in 1998. This increase followed declining total enrollment in elementary and secondary schools during the 1970s and early 1980s (from 51.3 million in 1971 to 44.9 million in 1984).
- Total elementary and secondary school enrollment is projected to increase by percent (to 54.3 million) between 1998 and 2008.
- Secondary school enrollments (grades 9–12) are projected to increase by 11 percent for both public and private schools between 1998 and 2008, while enrollment in pre-kindergarten through grade 8 is projected to decrease slightly.
- Total public school enrollment is projected to increase in the South and West (by 4 and 11 percent, respectively) but to decrease in the Northeast and Midwest (by 1 and 3 percent, respectively) between 1998 and 2008.

Elementary and secondary school enrollment (in thousands), by control and grade level of school, with projections: Fall 1970–2008

	Public schools			Private schools		
Year/period	Grades PreK–12	Grades PreK–8	Grades 9–12	Grades PreK–12	Grades PreK–8	Grades 9–12
1988	40,189	28,501	11,687	5,241	4,036	1,206
1998	46,792	33,522	13,270	5,927	4,588	1,339
	Projected [1]			Projected [2]		
2008	48,201	33,455	14,746	6,067	4,579	1,488
	Percentage change			Percentage change		
1970–88	-12.4	-12.5	-12.4	-2.3	-0.4	-8.0
	Projected percentage change			Projected percentage change		
1988–98	16.4	17.6	13.5	13.1	13.7	11.0
1998–2008	3.0	-0.2	11.1	2.4	-0.2	11.1

Public elementary and secondary school enrollment (in thousands), by region, with projections: Fall 1980–2008

Fall of year	Northeast	Midwest	South	West
1980	8,215	10,698	14,134	7,831
1988	7,208	9,846	14,491	8,644
1990	7,282	9,944	14,807	9,184

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[1] Beginning in fall 1980 , data include estimates for the expanded universe of private schools.

[2] Enrollment includes students in kindergarten through grade 12 and some nursery school students.

NOTE: Details may not add to totals due to rounding

SOURCE: U.S. Department of Education, National Center for Education Statistics, *Digest of Education Statistics 1998* (based on Common Core of Data) and *Projections of Education Statistics to 2008*, 1998.

Fall of year	Northeast	Midwest	South	West
1995	7,894	10,512	16,118	10,316
1998*	8,215	10,680	16,864	11,033
2008*	8,100	10,344	17,501	12,257
		Projected percentage change		
1988–98	14.0	8.5	16.4	27.6
1998–2008	-1.4	-3.1	3.8	11.1

* Projected enrollment. Enrollment includes students in kindergarten through grade 12 and some nursery school students.

NOTE: Details may not add to totals due to rounding

SOURCE: U.S. Department of Education, National Center for Education Statistics, *Digest of Education Statistics 1998* (based on Common Core of Data) and *Projections of Education Statistics to 2008*, 1998.

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The full indicator and all supplemental tables pertaining to this indicator may be viewed at http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2000008.

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Reports & Resources

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Center for Commercial Free Education. http://www.commercialfree.org.

Center for Media Education

http://www.cme.org

Commercial Alert

http://www.essential.org/alert

Federal Trade Commission

Privacy Initiatives http://www.ftc.gov/privacy/index.html

Kids Privacy http://www.ftc.gov/bcp/conline/edcams/kidzprivacy/index.html ■

END NOTES

1. The author identifies companies that do business through the Internet as Dot.com companies. She uses Dot.edu as a description of schools' use of the Internet for educational purposes.
2. Consumers Union (1995). *Captive Kids: A Report on Commercial Pressures on Kids at School.* http://www.consumersunion.org/other/captivekids/ .index.htm.
3. Federal Trade Commission, *Online Profiling: A Report to Congress*, June 2000 http://www.ftc.gov/os/2000/06/ onlineprofilingreportjune2000.pdf.
4. Ebersole, S., Adolescents' Use of the World-Wide Web in Ten Public Schools: A Uses and Gratifications Approach. 1999 (doctoral dissertation) http://faculty.uscolo.edu/ebersole/diss/pdf_docs.html
5. J. Niederst, *Web Design in a Nutshell.* Sebastol, Ca: O'Reilly & Associates, Inc. 1999. p. 322.
6. Federal Trade Commission, *Online Profiling: A Report to Congress*, June 2000 http://www.ftc.gov/os/2000/06/ onlineprofilingreportjune2000.pdf. p. 8.
7. Business Week/Harris Poll: A Growing Threat, *Business Week*, March 20,2000. http://www.businessweek.com/2000/00_12/b3673010.htm?scriptFramed.
8. NASBE 2000 Standing Resolutions, E. Corporate Involvement in Schools, (http://www.nasbe.org/resolutions.html).
9. 45 CFR part 46
10. 16 C.F.R. Part 312
11. NASBE 2000 Standing Resolutions.
12. The provision by a student of his or her name and address to a university to receive information materials or to a company when seeking internship opportunity are examples of legitimate educational purposes.

Responsible Netizen *Responsible Netizen is a new initiative of the Center for Advanced Technology in Education (CATE), University of Oregon College of Education. Responsible Netizen will develop effective strategies to assist young people in gaining the knowledge, decision-making skills, motivation, and self-control to behave in a safe, responsible, legal, and ethical manner when using the Internet and other information technologies and disseminate these strategies to schools, libraries, parents, policy-makers, and others. http://netizen.uoregon.edu.*

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In Your Interest

A Multilingual America: Issues for School Boards

by April Davis

"Alternative language education should stop and English should be acknowledged once and for all as the official language of the United States," insisted Bob Dole, speaking about what he perceived to be the need to limit native-language instruction. But bilingual education has existed in this country since the eighteenth century, when classes were taught in Swedish, French, and German. Generally, such programs were ended after World War I. Multilingual instruction was reintroduced to public education in the 1960s, when the civil rights movement extended to language minorities, especially Hispanics, who had higher drop-out rates than other school-age populations. Congress responded by implementing Title VI of the Civil Rights Act of 1964 and The Bilingual Education Act, which prohibited race-based discrimination and established the first federal bilingual education initiative, respectively.

Native-language instruction is based on the theory that students need to be fluent in their native language to facilitate learning a second language. Two methods for educating limited-English children are currently used. Most bilingual programs can be classified as transitional bilingual education (TBE) in which children are taught academic subjects in their native language; English instruction occurs separately. Other programs incorporate the teaching of English into the regular curriculum. These include structured immersion programs and English-as-a-second-language (ESL) classes. Structured immersion classes are conducted in English, but in a special class for limited-English-proficient (LEP) children so teachers can take proficiency levels into account. Students in ESL programs are taught most subjects in English but attend a separate class for English instruction.

Proponents claim that bilingual education allows students to become proficient in English and the native language and to learn more about the native culture. To them, bilingual education logically takes into account the idea that teachers should start with concepts with which the children are familiar and then cover new material. The US Department of Education summarized a study reporting that students in bilingual programs achieved literacy at rates comparable to students in the regular curriculum, achieving reading and writing skills at a rate as fast as, or faster than, the general population (*Bilingual Education: A Failed Experiment on the Children, Richman, 1997*).

Critics of bilingual education claim little empirical evidence exists to show that it has been successful. Proponents believe it is good education practice because takes into account the idea that teachers should start with familiar concepts and then move forward to new material.

Those in favor of bilingual education point to the consequences of English-only instruction and denying language minorities access to materials in their native tongue. They claim that a monolingual approach isolates language minorities. A lack of bilingual services limits their political participation and access to public services such as health care. Such an initiative violates their civil rights and "raises Constitutional concerns." In addition, by disseminating information only in English, the government limits its ability to reach all groups within society. Multilingual advocates know that being able to communicate in other languages besides English facilitates interaction with foreign markets, which is essential in today's global economy.

Critics point to other evidence that lends support to English-only instruction. They claim that little empirical evidence exists to indicate that bilingual education has been a success and point out that virtually no research has been conducted to suggest evidence of the facilitation effect or the transfer of skills. According to Rosaline Porter, author of *The Case Against Bilingual Education*, it is unrealistic to expect that several years of primarily native-language instruction will lead to better proficiency in English. The goal to help children become "balanced bilinguals" takes away from classroom time and re-

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April Davis, a junior Social Policy major at Northwestern University, served a summer internship in NSBA's National Education Policy Network.

In Your Interest/continued

sources that should be allocated to provide for the more immediate educational needs of students, such as mastery of subject material. Porter's fifteen years of investigation in the field failed to find any conclusive evidence to support the transfer-of-skills theory. Furthermore, in *Bilingual Education, a Failed Experiment on the Children*, educational psychologist Kenji Hakuta states, "What is remarkable about the issue of transfer of skills is that despite its fundamental importance, almost no empirical studies have been conducted to understand the characteristics or even to demonstrate the existence of transfer of skills." Those opposed to bilingual education suggest that it hinders a child's ability to learn English, since most subjects are taught in the native language. This contributes to academic failure and interferes with assimilation.

How quickly non-English speaking students assimilate appears to depend on the education methods used.

Researchers measure the success of bilingual education in terms of exit rates. The New York City Board of Education conducted a longitudinal study (1990-1994) to compare "mainstreaming" rates for bilingual students to students in ESL and immersion programs. Eighty percent of students who entered kindergarten and were enrolled and instructed in English-as-a-second-language classes reached proficiency in three years, while only 52% of bilingual students did so. For those entering in second grade, the rates were 68 % and 22%, respectively. Similarly, students in immersion programs took three to four years to reach a level of proficiency that enabled them to transition to the regular classroom without further instructional support; bilingual students took six to seven years to attain that level. According to Porter, a longitudinal study of immersion programs in El Paso yielded similar results.

Moreover, the vast majority of Latino parents want their children to learn English. They would like their children to learn Spanish, but not without the opportunity to be taught in English. A 1997 poll conducted by the *Los Angeles Times* revealed that 83% of Latino parents surveyed wanted English instruction for their children upon entering school. California parents have even boycotted schools because of their failure to teach English. Parental opposition to bilingual education in California was reflected by their overwhelming vote in support of Proposition 227, an initiative that virtually ended transitional bilingual education programs. The English-only measure was initiated by Ron Unz, a California businessman, who was concerned about low achievement of bilingual students in the public schools. He co-wrote the proposition with the help of educator Gloria Matta Tuchman and established One Nation/One California to gain support for his plan. He also contributed a significant portion of his own money to the campaign. The proposal was voted on June 2, 1998 and took effect the following September.

According to the legislation, students are to be placed in English immersion programs until they reach an adequate level of proficiency, at which point they are placed in a mainstream classroom. If they have difficulty keeping up academically, they can be re-enrolled in the immersion class for up to one year. At any time, parents can request that their children be placed in the regular classroom. Furthermore, students cannot be re-assigned to immersion classes if their parents object. They can also request a waiver by which their child is exempted. Exceptions can be granted in cases in which educators believe that the immersion or mainstream classrooms do not provide an optimal learning environment. If a significant number of requests are granted, schools must offer classes employing "bilingual techniques and other generally recognized educational methodologies permitted by law" to these children.

The American system of bilingual education is almost nonexistent elsewhere in the world.

Evidence suggests that the measure is having a positive impact on student achievement. Just seven months after the passage of this piece of legislation, standardized test scores among Hispanic students in Oceanside School District doubled and in some cases tripled in nearly all subjects and grade levels. Oceanside is considered to have adopted the most stringent interpretation of Proposition 227 and requires that 98% of classroom instruction be conducted in English. These results have prompted other states to consider implementing legislation to limit bilingual education. More than a dozen have passed laws that prohibit the provision of bilingual services to non-English-speaking residents, or otherwise prohibit governments from enacting legislation that would "ignore the role of English." In Arizona, a proposal similar to the California initiative has gained enough support to be placed before voters in November. While such measures are still frequently regarded as experimental in the United States, they are prevalent throughout the world. In many countries with large numbers of people who do not speak the national language, children are placed in one-year structured immersion programs or "sink-or-swim" submersion programs. The American system of bilingual education is almost nonexistent elsewhere in the world.

Another issue to consider when making decisions about bilingual education involves equality. While the majority of dual language programs are concerned with English and Spanish, Spanish-speaking students are not the only language minorities served by the public schools. According to Richard Seder in *Bilingual Education: Reading, Writing and Rhetoric*, in California alone, more than one hundred different languages and dialects are spoken. In some cases, there are no teachers available who speak a student's native tongue, which rules out placement in a transitional bilingual classroom. It does not seem fair to provide bilingual instruc-

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In Your Interest /continued

tion to some groups while leaving others without instructional support.

Legislation regarding instructional services to LEP children also has a significant impact on school boards, since they are responsible for managing the curriculum. *Becoming a Better Board Member* lists several responsibilities of school boards, among them, accountability. Boards have to keep a record of student achievement and take that into account when making decisions regarding modifications in the curriculum. School boards also have to ensure that any policies they enact are in compliance with all federal and state laws. Structure and advocacy are also important. School districts need to look at the individual characteristics of the schools to decide what is best for the students. When operating programs for students not fluent in English, school boards should institute an appropriate plan, set high standards, and evaluate it periodically to make sure it is meeting its objectives. Board members should be open to each other's suggestions and more than one possible solution. Involvement of parents and teachers in curriculum modification should also be included.

When operating programs for students not fluent in English, school boards should institute an appropriate plan, set high standards, and evaluate it periodically to make sure it is meeting its objectives.

School districts can take initiatives to modify instructional support services to non-English speakers provided they do not conflict with federal or state legislation. In Chicago, for example, the school board in 1997 elected to restrict bilingual education. According to the policy, students are to be kept in a bilingual program for no more than three years. The policy was implemented in response to concern about the increasing lengths of time students remained in bilingual programs. Within three years, the proportion of students who took four or more years to move into English-only classrooms climbed from 13% to 22% (*Education Week*, March 4, 1998). The plan was also enacted to conform to bilingual education regulations, which were revised in 1996. The Chicago example is representative of similar courses of action being taken throughout the country. ■

Court View
Continued from page 13

Status of Athletic Associations – Court Decisions

Even if courts had found a constitutionally-protected interest in participation in interscholastic sports, it remains a question whether private athletic associations, of which both public and private schools and school districts are members, would be subject to constitutional restraints. The Fourteenth Amendment prohibits deprivations of life, liberty or property rights a by a *state* without due process. Courts generally will not interfere with internal affairs of voluntary associations except in such cases where fraud or lack of jurisdiction can be applied. In Robinson v. Illinois High School Association, (45 Ill.App.2d 277, 195 N.E.2d 38 (2nd Dist. 1963)), an Illinois court held that, in the absence of evidence of fraud or collusion, or that the association acted unreasonably, arbitrarily or capriciously, the association must be allowed to enforce its rules and orders without interference from the courts.

In the context of claims brought under the Americans with Disabilities Act, sections of which apply to "public entities," and "public accommodations," however, a number of federal district courts have found state athletic associations to be instrumentalities of the state when they are sanctioned by state law, are official associations of the state, and are intertwined with state instrumentalities such as schools and their facilities. (See: Hoot v. Milan Area Schs., 853 F.Supp. 243, 251 (E.D.Mich., S.D.1994)); Ganden v. National Collegiate Athletic Association, (1996 WL 68000 (November 21, 1996, unpublished)), citing Welsh v. Boy Scouts of America, (993 F.2d 1267 (7th Cir. 1993)).

Conclusion

John Doe and student athletes like him will have an uphill battle to fight should they try to challenge athletic eligibility decisions in court. Because there is no constitutional right associated with participation, absent clearly arbitrary or capricious actions on the part of the school district or athletic association, John is likely to be unsuccessful in court. ■

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Court View

Life, Liberty, and the Right to Participate in Athletics?

A Brief Summary of the Law on the Rights of Student Athletes

By Sonja H. Trainor,
attorney with the law firm of Hodges, Loizzi, Eisenhammer, Rodick & Kohn,
Arlington Heights, Illinois

In recent years, big sports have become big business. College athletic scholarships can be worth over $100,000 for four or five years of school. Professional contracts, likewise, frequently carry dollar figures with six or seven figures. Only a small percentage of players make it to the professional level, however, a fact which may be to blame for the intensity with which players and their parents now approach interscholastic sports at the elementary and secondary level. The experience and exposure a student athlete obtains from participation in interscholastic competition is necessary to be noticed by college scouts, offered a college scholarship, and eventually, perhaps, make it to the pros.

Many students and their parents place tremendous importance on athletics which explains why they are willing to contest "unfair" eligibility decisions in court. Unfortunately, courts have not generally been willing to interfere with these decisions. In her article, Sonja Trainor provides good information about sports, the law and student rights.

There is a great deal at stake for student athletes, therefore, when they participate in sports at the elementary and secondary level. Students and their parents place tremendous importance on the role of athletics in the students' lives, which explains why they are willing to bring an action in court to contest eligibility rules that they believe have been unfairly applied. Unfortunately for the students, courts are reluctant to interfere with eligibility decisions of schools and athletic associations, and have repeatedly found no constitutionally-protected right to participate in interscholastic athletics. Although students are entitled to minimal protection – against arbitrary and capricious decisions, for instance — their right to participate in sports does not rise to the level of life, liberty or property.

The Typical Case

State and federal courts often address the following factual scenario: John Doe is a junior in high school and a star on the school's basketball team. Scouts from several large universities have been attending games and have shown an interest in recruiting John to play for their schools. The week before John's high school team is scheduled to play in the state basketball tournament —an event that attracts many college scouts — he attends a party at which alcohol is being consumed. It is disputed as to whether John actually consumed any alcohol himself but, under the school district's athletic code of conduct and the rules of the athletic association of which the district is a member, such behavior makes John ineligible to play basketball for one month.

Not agreeing with this decision, John and his parents hire an attorney and go to court seeking a Temporary Restraining Order preventing the district and the athletic association from finding him ineligible to play and directing them to allow him to play in the state tournament. What should the court decide?

No Constitutional Right to Athletic Participation — Court Decisions

Federal courts faced with situations similar to the hypothetical case presented above have almost universally found that the student has no protectable interest in participation in interscholastic athletics. They have found that the privilege of participating in intersholastic sports is just that, a privilege or an expectation, not a property right protected by due process, or a contract or other economic right.[1] One federal court explained as follows:

> "[The Fourteenth Amendment] protects only liberty and property interests that are viewed by the

continues on page 13

Court View/continued

courts as of a high enough dignity to warrant due process protection, and the ability of a high school student to engage in extracurricular activity is simply not of that degree of dignity." Farver v. Board of Educ. of Carroll County, (40F.Supp.2d 323, 324-325 (D.Md.1999)).

State courts, too, have repeatedly found that student-athletes have no constitutional right of participation. Jordan v. O'Fallon Township High Sch. Dist. No. 203 Bd. of Educ., (302 Ill.App.3d 1070, 235 Ill.Dec. 877, 706 N.E.2d 137, 140 (1999)); Spring Branch, (695 S.W.2d at 561); Bailey v. Truby, (174 W.Va. 8, 321 S.E.2d 302 (1984)). In *Jordan*, a star football player was suspended from participation for his entire senior season due to a second alcohol-related violation of the school's athletic code of conduct. (706 N.E.2d at 139.) The Court upheld the suspension. Holding that the student had no constitutionally-protected interest in participating in interscholastic athletics, and that the student had no heightened interest compared to other students simply because the student's talent could have merited him a college scholarship, the court stated:

> Students can need, want, and expect to participate in interscholastic athletics, but students are not entitled to participate in them. Football is neither an integral part of a quality education nor a requirement under any rule or regulations governing education in this State. . . .

In Jordan v. O'Fallon Township H.S.D. #203, the court stated: "Students can need, want, and expect to participate in interscholastic athletics, but students are not entitled to participate in them."

The *Jordan* decision is in harmony with decisions of federal courts that any interest a student has in a future professional athletic career is "speculative and not of constitutional dimensions." Colorado Seminary v. NCAA, (417 F.Supp. 885, 895 (D.Colo.1976)). (See also Parish v. NCAA, 506 F.2d 1028, 1034 n. 17 (5th Cir.1975); and Hawkins v. NCAA, 652 F.Supp. 602, 611 (C.D.Ill.1987)). Moreover, courts are generally reluctant to intrude on the disciplinary decisions of school districts, particularly when the extraordinary relief of an injunction is at stake. *Jordan*. (See also: Clements v. Board of Education of Decatur Public School District No. 61, (133 Ill.App.3d 531, 478 N.E.2d 1209, 1210, 1213 (4th Dist. 1985)).

Some courts have recognized, however, that schools and associations must afford student-athletes at least a minimal degree of procedural due process when enforcing eligibility rules against them. See L.P.M. v. School Board of Seminole County, Florida, 753 So.2d 130, 133 (holding that students were afforded complete due process when procedures listed in athletic "Standards" were substantially complied with, included administrative hearing at which students were represented by counsel and at which evidence and testimony were presented).

Football and basketball players aren't the only athletes unhappy when eligibility rules are linked to off-campus behavior. Cheerleaders at a Texas high school near Dallas now have personal experience with what their parents call an "inappropriate" punishment. Eleven Colleyville Heritage High School cheerleaders were involved in a drinking incident on August 3 of this year. This infraction of school rules resulted in their being placed in an alternative education program for three weeks. School district policy requires students involved in extracurricular activities to sign a pledge acknowledging their responsibility as role model and leader. Parents also sign the pledge. To fulfill their roles as models and leaders, the students promise not to drink, smoke or take drugs. They also must not attend or remain at activities where alcohol, drugs and tobacco are being consumed illegally. School district policy calls for a three-week suspension from extracurricular activities and attendance at three counseling sessions for first offender of this type. To the dismay of the cheerleaders and their parents, state education code dictates that if a student possesses, uses or is under the influence of alcohol while attending a school-sponsored or school-related event on or off campus, they will be placed in an alternative education program. The cheerleaders deny being intoxicated and that the incident did not occur at a school-sponsored or -related activity. Parents of the cheerleaders, believing the punishment does not fit the crime, plan to take their case to the school board if the district assistant superintendent does not overturn the punishment imposed by the school's principal. *From an August 24, 2000 news item appearing in The Dallas Morning News.*

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1. See, e.g., Hardy v. University Interscholastic League, 759 F.2d 1233 (5th Cir.1985); Davenport v. Randolph County Bd. of Educ., 730 F.2d 1395 (11th Cir.1984); Hebert v. Ventetuolo, 638 F.2d 5 (1st Cir.1981); Walsh v. Louisiana High School Athletic Ass'n, 616 F.2d 152 (5th Cir.1980), cert. denied, 449 U.S. 1124, 101 S.Ct. 939, 67 L.Ed.2d 109 (1981); Albach v. Odle, 531 F.2d 983 (10th Cir.1976); Farver v. Board of Educ. of Carroll County, 40 F.Supp.2d 323, 324-325 (D.Md.1999); James v. Tallassee High Sch., 907 F.Supp. 364, 366-67 (M.D.Ala.1995); Zehner v. Central Berkshire Regional School District, 921 F.Supp. 850 (D. Mass. 1995); Florida Youth Soccer Ass'n. v. Sumner, 528 So.2d 4 (Fla. 5th DCA 1988); Brands v. Sheldon Community Sch., 671 F.Supp. 627, 631 (N.D.Iowa 1987); Haverkamp v. Unified Sch. Dist. No. 380, 689 F.Supp. 1055, 1058 (D.Kan.1986); Spring Branch I.S.D. v. Stamos, 695 S.W.2d 556, 561 (Tex.1985), appeal dismissed, 475 U.S. 1001, 106 S.Ct. 1170, 89 L.Ed.2d 290 (1986); Proulx v. Illinois High School Association, 125 Ill.App.3d 781, 466 N.E.2d 620 (4th Dist. 1984).

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Policy Adviser/continued

PA system and conduct the service on a field adjoining — not on — the football field. The club would allow public participation. By conducting pre-game prayer services as a club, they argued, they would be adhering to requirements cited under the Equal Access Act would.

Another discussant, sharing a personal experience, felt the student's argument — based on the Equal Access Act — had the potential for legal trouble, especially from the ACLU. In a case involving prayer at school-sponsored events, he wrote, the ACLU took no issue with baccalaureate student-led prayer if it was conducted at a time and place apart from the school's official ceremony. But, prayer held in an area adjoining the playing field, using loudspeakers that carry sound to game attendees not participating in the service, was not acceptable to them. He suggested the prayer club check their legal position carefully before uttering the first prayer. Not doing so could make the prayer an expensive one.

Here's what the courts had to say

First Amendment: religion — school policy allowing student initiated prayer at school football game

Santa Fe Independent School District had an unwritten policy allowing students to read overtly Christian prayers at graduation ceremonies and football games. The school district retained control over the content of the prayers and speakers. After a student filed an action challenging the constitutionality of the district's policy on prayer at both graduation ceremonies and football games, the school district implemented separate written policies for these events. Both policies provided for student-selected, student- offered prayers but placed no restrictions on the content of the prayers. In the event that the school district was enjoined by a court from enforcing these policies, the district's alternative policy requiring that the content of all prayers be nonsectarian and nonproselytizing would automatically become the applicable policy. The district court, rather than enjoining the school district from enforcing its prayer policy, ordered it to implement the alternative policy but allowed prayers to name specific deities.

Based on circuit precedent in *Jones v. Clear Creek Independent School District*, 977 F.2d 963 (5th Cir. 1992) (*Clear Creek II*), a Fifth Circuit panel framed two main issues: (1) whether the constitutionality of the prayer policy depended on the inclusion of the restrictive "nonsectarian, nonproselytizing" language; and (2) whether the policy with or without the restrictive language could pass constitutional muster with respect to football games. In addition, the panel addressed the issue raised by the school district as to whether the policy had created a "limited open forum" thereby preventing it from placing any content restrictions on the students' prayers without violating their free speech rights. Applying the *Lemon* and endorsement tests to the policy, the panel concluded that stripped of its nonsectarian, nonproselytizing restrictions, the policy failed to satisfy either test. As a result, it held that unless the restrictive language was included in the policy, it violated the Establishment Clause. Regarding prayer at football games, the panel found that with or without the restrictions the policy would be unconstitutional because football games lack the sober atmosphere, such as a graduation ceremony, in which an event could be appropriately solemnized with prayer. In response to the school district's "limited open forum" argument, the panel noted that two key factors determine creation of a designated public forum: (1) governmental intent and (2) the extent of the use granted. As to governmental intent, it found that neither the character nor the history of graduation ceremonies suggests that they serve as forums for public debate or discussions in which varying groups voice their viewpoints. On the contrary, the panel concluded that a graduation ceremony is diametrically opposite from the type of venues that serve as places for debate or exchange of competing viewpoints. As to the second factor, the panel found that the school district had not granted general access to a class of speakers at graduation ceremonies. Rather the policy allowed a limited number of speakers to deliver statements that could only be characterized as prayers.

The Supreme Court, addressing only the issue of prayers at football games, affirmed the Fifth Circuit in a six to three decision. Justice Stevens, joined by Justices O'Connor, Kennedy, Souter, Ginsburg, and Breyer, delivered the Court's opinion. Chief Justice Rehnquist, joined by Justices Scalia and Thomas, filed a dissent. The majority held that the school district's policy of permitting student-led, student-initiated prayer at football games violated the Establishment Clause. Justice Stevens, stating that he was guided by the principles endorsed in *Lee*, concluded the football game prayer policy contained sham secular purposes that were nothing more than an attempt to preserve the district's "long-sanctioned practice of prayer before football games" by disguising it as private speech. He rejected the school district's argument that the policy was distinguishable from *Lee* because there was no element of coercion on the students. Justice Stevens reasoned that although football games are generally voluntary extracurricular activities, attendance at games is mandatory for band members, cheerleaders, and players. He also noted the immense social pressure on students to attend extracurricular events. Finally, Justice Stevens rejected the school district's contention that the students' facial challenge must fail because no invocation had yet been delivered under the policy. He declared that the mere creation of the policy constituted the violation because at that point the district demonstrated a purpose and created a perception of governmental establishment of religion. ■

(Source: NSBA's Office of general Council: ***Santa Fe Independent School District v. Doe***, No. 99-62 (U.S. Sup. Ct. June 19, 2000) http://supct.law.cornell.edu/supct/html/99-62.ZS.html

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National Education Policy Network

National School Boards Association
1680 Duke Street
Alexandria, Virginia 22314

Policy Adviser

The topic of school sponsored prayer at football games has received a lot of attention in our district. The district has maintained the position that supports a separation of church and state, but when sports events are involved there appears to be more opinion generated on the subject. Can you provide some assistance?

Board Member — South Carolina

Although the June 2000 Supreme Court decision on school-sponsored pre-game prayer clearly stated that such policy was a violation of church-state separation, some persons are searching for legal "loopholes" that might allow them to continue publicly-held prayer services before games. Members of the Council of School Attorneys (COSA) online discussion group recently discussed the question of allowing school-sponsored prayer before a sporting event. One discussion group member offered the following account to help stimulate discussion:

The high school *Fellowship of Christian Athletes* in his district initiated a novel approach to the situation. They suggested continuing to have pre-game prayers but they would do this as a club. They also would use their own portable

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For more policy help

Sample policies and regulations relating to topics covered in this month's Updating are included in the school administrator's copy of this publication. These are:

IHBEA — English as a second language

JJIC — Eligibility/Minimum standards for participation in student activities

KG — Business and Industry Involvement in Education

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